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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

2017 APR 18 A 11:49

U.S. DISTRICT COURT
EASTERN DIST. TENN.

DEPT. CLERK

UNITED STATES OF AMERICA	)	
	)	
V.	)	3:17-CR-41
	)	JUDGE
ROBERT L. ROSE	)	Reeves/Shirley
Aka Toby Rose	)	**To be Filed Under Seal**
Aka "Pap"	)	
Aka "The President"	)	
BRANDON S. HILL	)	
RUTH ANN OLIVER	)	
BOBBY R. LEACH	)	
MELVIN L. SWINEY	)	
KEVIN R. ADDINGTON	)	
JOHN R. ELROD	)	
WILLIAM A. DYER	)	
Aka Ernie Dyer	)	
MELISSA D. COFFEY	)	
TIFFANY N. COFFEY	)	

INDICTMENT

COUNT ONE

The Grand Jury charges that from on or about January 1, 2014 to on or about April 18, 2017, within the Eastern District of Tennessee, and elsewhere, the defendants, ROBERT L. ROSE, also known as Toby Rose, also known as "Pap," also known as "The President," BRANDON S. HILL, RUTH ANN OLIVER, BOBBY R. LEACH, MELVIN L. SWINEY, KEVIN R. ADDINGTON, JOHN R. ELROD, WILLIAM A. DYER, also known as Ernie Dyer, MELISSA D. COFFEY, TIFFANY N. COFFEY, and other persons known and unknown to the Grand Jury, did knowingly, intentionally, and without authority combine, conspire, confederate and agree with each other and with diverse others to commit the following offenses against the United States of America: The distribution of 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

[21 U.S.C. §§ 846 and 841(b)(1)(A)]

COUNT TWO

The Grand Jury further charges that on diverse days between June of 2014 and November 6, 2015, in the Eastern District of Tennessee, the defendant, MELVIN L. SWINEY, did knowingly possess firearms, namely, .22 caliber Ruger pistol and a .22 caliber Luger pistol, in furtherance of drug trafficking offenses for which he may be charged in a court of the United States, as charged in Count One, namely, a violation of Title 21, United States Code, Section 846, which is hereby incorporated by reference.

[18 U.S.C. § 924(c)(1)(A)]

COUNT THREE

The Grand Jury further charges that on or about March 6, 2016, in the Eastern District of Tennessee, the defendant, WILLIAM A. DYER, also known as Ernie Dyer, did knowingly, intentionally, and without authority possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

[21 U.S.C. §§ 841(a)(1) and (b)(1)(C)]

COUNT FOUR

The Grand Jury further charges that on or about March 6, 2016, in the Eastern District of Tennessee, the defendant, WILLIAM A. DYER, also known as Ernie Dyer, did knowingly possess a firearm, namely, Smith and Wesson Bodyguard .380 caliber handgun, in furtherance of drug trafficking offenses for which he may be charged in a court of the United States, as charged in Count Three, namely, a violation of Title 21, United States Code, Section 841, which is hereby incorporated by reference.

[18 U.S.C. § 924(c)(1)(A)]

COUNT FIVE

The Grand Jury further charges that on or about March 7, 2016, in the Eastern District of Tennessee, the defendant, BRANDON S. HILL, did knowingly, intentionally, and without authority possess with the intent to distribute 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

[21 U.S.C. §§ 841(a)(1) and (b)(1)(B)]

COUNT SIX

The Grand Jury further charges that on or about March 7, 2016, in the Eastern District of Tennessee, the defendant, BRANDON S. HILL, did knowingly possess a firearm, namely, an RG Model 23 .22 caliber handgun, in furtherance of drug trafficking offenses for which he may be charged in a court of the United States, as charged in Count Five, namely, a violation of Title 21, United States Code, Section 841, which is hereby incorporated by reference.

[18 U.S.C. § 924(c)(1)(A)]

COUNT SEVEN

The Grand Jury further charges that on or about March 7, 2016, in the Eastern District of Tennessee, the defendant, ROBERT L. ROSE, also known as Toby Rose, also known as "Pap," also known as "The President," did knowingly, intentionally, and without authority, possess with the intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

[21 U.S.C. §§ 841(a)(1) and (b)(1)(A)]

COUNT EIGHT

The Grand Jury further charges that on or about March 7, 2016, in the Eastern District of Tennessee, the defendant, ROBERT L. ROSE, also known as Toby Rose, also known as "Pap," also known as "The President," did knowingly possess firearms, namely, a Glock 9mm handgun, a Hi-Point 45 caliber handgun, a SCCY 9mm handgun, and a US small revolver, in furtherance of drug trafficking offenses for which he may be charged in a court of the United States, as charged in Count Seven, namely, a violation of Title 21, United States Code, Section 841, which is hereby incorporated by reference.

[18 U.S.C. § 924(c)(1)(A)]

COUNT NINE

The Grand Jury further charges that on or about March 7, 2016, in the Eastern District of Tennessee, the defendant, KEVIN D. ADDINGTON, did knowingly, intentionally, and without authority, possess with the intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

[21 U.S.C. §§ 841(a)(1) and (b)(1)(A)]

COUNT TEN

The Grand Jury further charges that on or about May 16, 2016, in the Eastern District of Tennessee, the defendant, MELISSA D. COFFEY, did knowingly, intentionally, and without authority, possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

[21 U.S.C. §§ 841(a)(1) and (b)(1)(C)]

COUNT ELEVEN

The Grand Jury further charges that on or about May 16, 2016, in the Eastern District of Tennessee, the defendant, MELISSA D. COFFEY, did knowingly possess a firearm, namely, a Lorcin .380 caliber semi-automatic pistol, in furtherance of drug trafficking offenses for which she may be charged in a court of the United States, as charged in Count Ten, namely, a violation of Title 21, United States Code, Section 841, which is hereby incorporated by reference.

[18 U.S.C. § 924(c)(1)(A)]

[redacted]
FOREPERSON

APPROVED:

NANCY STALLARD HARR
UNITED STATES ATTORNEY

By: Caryn L. Hebets
CARYN L. HEBETS
ASSISTANT UNITED STATES ATTORNEY